

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

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|------------------------------|---|--------------------------|
| In re: |) | |
| |) | |
| WILLIAM CHARLES BEVAN |) | Case No. 22-12609 |
| |) | (Chapter 7) |
| |) | |
| |) | |

**MOTION FOR EXTENSION OF TIME TO RESPOND TO CHAPTER 7 TRUSTEE’S
MOTION FOR AUTHORITY TO MAKE AN INTERIM DISTRIBUTION**

John Burns and The Burns LawFirm, LLC (collectively, “Mr. Burns”) through undersigned counsel, Timothy Carey, Esquire, and WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER, LLP, hereby file this Motion for an Extension of Time to Respond to the Chapter 7 Trustee’s Motion to Make an Interim Distribution [ECF # 466]. While Mr. Burns is generally not opposed to the requested relief, there are certain clarifications sought regarding the statements made therein regarding the funds remaining in the Estate and are currently waiting on a response from the Chapter 7 Trustee. The deadline to respond to the simultaneously filed First Application for Approval of Compensation and Expenses of McNamee Hosea, P.A. for June 14, 2023 Through October 31, 2025 [ECF # 627] is one week from today, January 27, 2026. Mr. Burns would request that the deadline to respond to the instant motion be extended to that date as well with the hope that following discussions with the Chapter 7 Trustee, no additional filings will be necessary.

WHEREFORE, Mr. Burns respectfully requests that this Bankruptcy Court enter an Order extending the deadline to respond to the Chapter 7 Trustee’s Motion for Authority to Make an Interim Distribution to January 27, 2026, and for any further relief the Court deems just and appropriate.

Respectfully submitted,

**WILSON, ELSER, MOSKOWITZ,
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 22nd day of January 2026, I served the foregoing Motion electronically, via CM/ECF upon:

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